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8 Attorneys for Plaintiff
9 Carolyn A. Dye, Chapter 7 Trustee

10 UNITED STATES BANKRUPTCY COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 LOS ANGELES DIVISION

13 In re:

14 URBAN COMMONS, LLC,
15 Debtor.

16 CAROLYN A. DYE, Chapter 7
17 Trustee,

18 Plaintiff,

19 v.

20 JOSEPH FAN

21 Defendant.

Case No.: 2: 21-bk-13523 WB
Chapter 7

Adv. No.: 2:23-ap-01254 WB

STIPULATION FOR VOLUNTARY
DISMISSAL OF ADVERSARY
PROCEEDING

Pretrial Conference

DATE: July 8, 2025

TIME: 2:00 P.M.

COURTROOM: 1375

ADDRESS: 255 E. Temple St.
Los Angeles, CA 90012

22 In accordance with Fed. R. Civ. P. 41(a)(1)(A)(ii), made
23 applicable to this Adversary Proceeding by Fed. R. Bankr. P.
24 7041, Plaintiff Carolyn A. Dye, Chapter 7 Trustee and Joseph Fan
25 by and through their respective counsel, pursuant to the Court
26 order approving the settlement agreement between the parties
27 they stipulate that this Adversary Proceeding is dismissed with
28 prejudice, with each party bearing its own costs and attorneys'

1 fees. The parties request that the Clerk of the Court mark the
2 Adversary Proceeding as "Closed."

3 SO STIPULATED

4
5 Dated: July 3, 2025

PEÑA & SOMA, APC

6
7 By: _____

LEONARD PEÑA
Attorneys for Plaintiff

8
9
10 Dated: July 3, 2025

PACHULSKI STANG ZIEHL & JONES
LLP

11
12 By: _____

JEFFREY P. NOLAN
Attorneys for Defendant

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1003 Diamond Ave., Suite 202, South Pasadena, California 91030

A true and correct copy of the foregoing document entitled (*specify*): Stipulation By Carolyn A Dye and Joseph Fan For Voluntary Dismissal Of Adversary Proceeding with proof of service

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 7/8/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Carolyn A Dye (TR)trustee@cadye.com, c197@ecfcbis.com;atty@cadye.com

Jeffrey P Nolan on behalf of Defendant jnolan@pszjlaw.com

Leonard Pena on behalf of Plaintiff Carolyn A. Dye

lpena@penalaw.com, penasomaecf@gmail.com;penalr72746@notify.bestcase.com

United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov ☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 7/8/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Julia W. Brand

United States Bankruptcy Court, Suite 1382

255 E. Temple Street, Suite 1360

Los Angeles, CA 90012

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

7/8/2025

Date

NOEMI SANDOVAL

Printed Name

/S/ NOEMI SANDOVAL

Signature